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August 26, 2015

VIA ELECTRONIC FILING

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
for the District of New Jersey
M.L. King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *Juice Entertainment, LLC v.*
Live Nation Entertainment, Inc.,
11 Civ. 07318 (WHW) (CLW)**

Dear Magistrate Judge Waldor:

We represent Defendant Live Nation Entertainment, Inc. ("Live Nation"); counsel for Plaintiffs Juice Entertainment, LLC, Thomas Dorfman and Christopher Barrett, join in this letter.

Following the telephonic conference with the Court on July 29, 2015, counsel have met and conferred concerning a proposed schedule for the completion of discovery. In this regard, the parties jointly request that the deadlines contained in the Court's Second Amended Scheduling Order dated August 21, 2013 (as amended by the Court's Order entered on October 31, 2013), be extended as follows:

1. Document production to be completed by November 1, 2015.
2. Fact discovery to be completed by January 31, 2016.
3. Plaintiffs' expert disclosures to be made by February 31, 2016. Defendant's expert disclosure to be made 10 days after Plaintiffs' expert report is due.
4. Plaintiffs' expert report(s) to be served by March 31, 2016. Deposition of plaintiffs' expert(s) to be completed by April 31, 2016.
5. Defendant's expert report to be served by April 31, 2016. Deposition of defendant's experts to be completed by May 31, 2016.

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6. Dispositive Motions to be filed by June 31, 2016.

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Counsel for the parties are available at the Court's convenience should the Court have any questions, issues or concerns. We thank the Court for its consideration and courtesies in connection with this joint request.

Respectfully submitted,

/s/ Ian S. Marx

IAN S. MARX

cc: Amy Walker Wagner, Esq. (via ECF)
David S. Siegel, Esq. (via ECF)